

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

THOMAS AND BETTS POWER
SOLUTIONS, LLC, d/b/a JT PACKARD &
ASSOCIATES,

Court File No. 10-cv-00213

Plaintiff,

vs.

S.R. BRAY LLC, d/b/a POWERPLUS!,
James NOLDEN, Sandy SCHIELE, Chris
BLODGETT, Jim UHALT, Scott
BOWMAN, Patricia EPSTEIN, Michele
MARTIN, Shane WOLFRAM, Jennifer
WINGERT, Sarah SULLIVAN, Kristi RUE,
Samantha MOYES, John ROIDT and Ben
WAIT,

**PLAINTIFF'S MOTION TO FILE
SECOND SUPPLEMENTAL
DECLARATION OF THOMAS
WARD UNDER SEAL**

Defendants.

Plaintiff Thomas & Betts Power Solutions, LLC, d/b/a JT Packard & Associates ("JT Packard"), hereby moves the Court for an Order allowing the Second Supplemental Declaration of Thomas Ward to be filed under seal.

Mr. Ward's Second Supplemental Declaration contains confidential and trade secret information regarding JT Packard's business. Although Defendants already have access to this information through their wrongful conduct, JT Packard seeks to seal this declaration, and its exhibits, in order to maintain the confidentiality of this information from others, in light of its requests for injunctive relief against Defendants.

Accordingly, JT Packard respectfully requests that the Court grant its motion to seal the Second Supplemental Affidavit of Thomas Ward, filed concurrently herewith.

Dated: May 11, 2010.

s/ George R. Wood

George R. Wood (SBN: 1073122)

Noah G. Lipschultz (MN SBN 0387308)

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